

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

BAHIA AMAWI

Plaintiff,

vs.

**PFLUGERVILLE INDEPENDENT SCHOOL
DISTRICT; and**

KEN PAXTON, in his official capacity as
Attorney General of Texas,

Defendants.

Case No. 1:18-cv-01091-RP

DECLARATION OF CHRIS CHOATE

I, Chris Choate, swear under the penalty of perjury that the following facts are true to the best of my knowledge, information, and belief:

1. I have personal knowledge of the facts set forth below. If I were called as a witness, I could competently testify about what I have written in this declaration.
2. I am currently a member of good standing of the State Bar of Texas and have been licensed since 2004.
3. I graduated from the Maurer School of Law at Indiana University Bloomington in 2004, and since then, I have practiced law in state and multiple federal courts. I am admitted to the Western, Southern, and Eastern Districts of Texas, and the Eastern District of Michigan. I have appeared pro hac vice in more than 25 federal district and circuit courts across the United States, from Tacoma, Washington to San Juan, Puerto Rico. While the John T. Floyd Law Firm is located in Houston, I am familiar with the Austin legal market and with rates Texas lawyers typically charge in metropolitan areas of the state.

4. I thus had 14 years of experience when I started this case. At this point, I have more than 15 years of legal experience.

5. I am an attorney for Bahia Amawi who has worked on this case. During the course of our representation, I have recorded the time spent performing legal services in this case. I entered in a description of the legal services together with the precise time, to .25 of an hour, spent performing such legal services on a daily basis. A true and correct copy of the spreadsheet recording that time is attached as Exhibit A.

6. The total amount of hours I expended in this action is 10 hours. These hours were all spent litigating this case in federal district court prior to May 7, 2019, the date Texas amended the anti-BDS law at issue in this case.

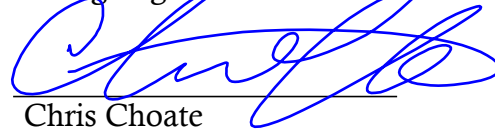
7. I certify that the hours listed were actually expended on the topics stated in my time sheet and that the hours expended were reasonable. I also certify that the rate I am seeking is reasonable.

8. The current U.S. Attorneys Office *Laffey* matrix for the District of Columbia uses a \$491.00 hourly rate for an attorney with my experience for 2018, a \$491.00 hourly rate for an attorney with my experience in 2019, and a \$510.00 hourly rate for an attorney with my experience in 2020. See <https://www.justice.gov/usao-dc/file/796471/download>.

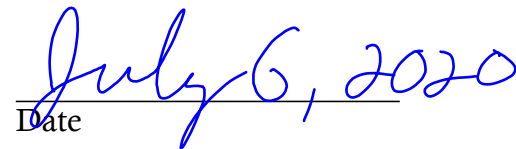
9. My rate for this case was \$450.00 per hour, and John T. Floyd's rate was \$500.00. In my experience, within this State's metropolitan areas, reputable lawyers typically charge: (1) with more than 25 years of experience, between \$700-\$1000 per hour, (2) with between 15-25 years of experience, \$500-700 per hour, (3) with between 8-15 years of experience, \$400-600, and (4) with 5-8 years of experience, \$350-550 per hour. I have reviewed the fee rates sought by the CAIR attorneys in this case, including the \$550 rate sought by Justin Sadowsky and Lena Masri, the \$450 rate sought by Carolyn Homer, and Gadeir Abbas. Those rates are reasonable, particularly in light of the specialized skills of

the attorneys in this case.

I swear under the penalty of perjury that the foregoing is true and correct.



Chris Choate



Date

Exhibit A - John T Floyd Law Firm Hours Spreadsheet

Bahia Amawi Timesheet

Date	Task	Timekeeper	Hours	Fee
December 10, 2018	Review draft Complaint	JTF	0.5	\$250.00
	Review draft Complaint	CMC	0.5	\$225.00
December 11, 2018	Firm meeting regarding Complaint	JTF	0.5	\$250.00
	Firm meeting regarding Complaint	CMC	0.5	\$225.00
	Research re Complaint	CMC	0.5	\$225.00
	Research re Complaint	JTF	1	\$500.00
December 12, 2018	Review/Respond to Correspondence with Ptf Counsel	JTF	0.75	\$375.00
December 13, 2018	Review/Respond to Correspondence with Ptf Counsel	JTF	0.5	\$250.00
December 14, 2018	Review/Respond to Correspondence with Ptf Counsel	CMC	0.25	\$112.50
	Review/Respond to Correspondence with Ptf Counsel	JTF	0.25	\$112.50
December 16, 2018	Review/Respond to Correspondence with Ptf Counsel	CMC	0.25	\$112.50
December 16, 2018	Review/Respond to Correspondence with Ptf Counsel	JTF	0.5	\$250.00
	Filing Complaint	CMC	0.75	\$337.50
	Review Case Notifications	CMC	0.25	\$112.50
	Review Case Notifications	JTF	0.25	\$125.00
December 17	Review/Respond to Correspondence with Ptf Counsel	CMC	0.25	\$112.50
	Review Case Notifications	CMC	0.25	\$112.50
	Review Case Notifications	JTF	0.25	\$125.00
	Review/Respond to Correspondence with Ptf Counsel	CMC	0.25	\$112.50
December 18	Review/Respond to Correspondence with Ptf Counsel	JTF	0.5	\$250.00
	Review/Respond to Correspondence from prospective amici	CMC	0.25	\$112.50
	Review/Respond to Correspondence from multiple prospective amici	JTF	0.25	\$125.00
	Review/Respond to Correspondence with Ptf Counsel	CMC	0.5	\$225.00
December 19, 2018	Review/Respond to Correspondence with Ptf Counsel	CMC	0.25	\$112.50
	File motions to appear Pro Hac Vice	CMC	0.5	\$225.00
December 20, 2018	Review/Respond to Correspondence between AG's office and Ptf Counsel	CMC	0.5	\$225.00
	Review/Respond to Correspondence between AG's office and Ptf Counsel	JTF	0.5	\$250.00
	Review/Respond to Correspondence from prospective amici	CMC	0.25	\$112.50
	Review/Respond to Correspondence from Ptf Counsel	CMC	0.25	\$112.50
	Review/Respond to Correspondence from Ptf Counsel	JTF	0.25	\$125.00
	Review/Respond to Correspondence from Ptf Counsel	JTF	0.25	\$125.00

December 21, 2018	Review Preliminary Injunction Filings	JTF	1	\$500.00
	Review Preliminary Injunction Filings	CMC	1	\$450.00
	Filing Preliminary Injunction	CMC	0.5	\$225.00
	Review/respond Correspondence to Court	CMC	0.25	\$112.50
	Review/respond Correspondence with Ptf Counsel	CMC	0.75	\$337.50
	Review/respond Correspondence with Ptf Counsel	JTF	0.75	\$375.00
	Review Case Notifications	CMC	0.5	\$225.00
	Review Case Notifications	JTF	0.5	\$250.00
	Review/respond Correspondence with AG's Office	CMC	0.25	\$112.50
	Review/respond Correspondence with Ptf Counsel	CMC	0.25	\$112.50
Subtotal:			18.50	\$8,750.00
Filing Fees:				
Total:				\$8,750.00